

# DECLARATION OF RAYMOND E. WATSON

Now known Raymond E. Watson and Pursuant to 28 U.S.C. § 1748, declares under Penalty of Perjury that the foregoing is true and correct:

1. My name is Raymond Watson, and I am the above declarant, and have personal knowledge of the facts stated in this declaration.
2. I am incarcerated at the Trousdale Turner Correctional Center, a privately own prison. Operated by Core Civic Inc. of Tennessee, LLC, in Hartsville, TN.
2. Trousdale Turner is severely understaff, medical and mental health is inadequate, there is a complete disregard to inmates safety and security by administrators, staff and lower subordinates.
4. There are large populations of misclassified prisoners, numerous rapes, beatings, deaths and suicides.
5. Drugs such as: Fentanyl, Heroin, methamphetamines, cocaine, steroids, various pills, marijuana and cigarettes are brought in by administrators, correctional officers, counselors, medical personnel and outside providers.
6. Staff-on-inmate and inmate-on-inmate assaults are premeditated by the administration to quiet inmates who challenge the unconstitutionality of the systematic practices occurring here at T.T.C.C.

7. Medical and mental health is inadequate. Sick calls aren't being answered in a timely manner. And emergencies result to death.
8. The death toll rises everyday, hour, minute and second at Truscott Turner.
9. Truscott Turner - is severely understaff, each building holds the maximum capacity. There are 3 pods in each building (excluding A building)
10. There are 118 inmates per pod, and 354 inmates per building.
11. Only 1 officer posted every 12-14 hours shifts per building. At times there will be one (1) officer working 2 buildings, with 768 inmates under his/her supervision.
12. In case of emergencies, there aren't any officers nor departmental staff present for hours. There aren't any intercoms in the cells, and cells that have them do not work. There isn't any way possible to reach any prison officials.
13. Upon making contact with any administrator, to confront emergencies, overdoses which are common and runs rampant. The inmates will suffer severe retaliation by the administration. Such as property loss, false disciplinary charges, repetitive cell searches, unnecessary use of force, due to the drugs the administration brought into the institution.

14. Usually, when a inmate overdose, other prisoners gather around and get ice and place it around the prisoner private area and/or place him in the shower, until help arrives. This has been successful at times, and other times the inmate dies.
15. Medical and mental health care is inadequate. Sick calls are not answered in a timely manner, and health providers are not av
16. Grievances against administrators and staff are being destroyed, just rejected as inappropriate without any opportunity to appeal.
17. Retaliation for filing grievances against any staff members or administrators will inflict cruel and unusual punishment.
18. False disciplinary charges will be brought, staff will pay other prisoners and provide personal favors to others to assault prisoners and label them as snitches.
19. Prisoners are misclassified, protected custody, medium and minimum custody prisoners are housed together, as well prisoners with underlying and severe medical conditions.
20. When inmates complain about their misclassification, administrators will issue false disciplinary charges and place inmates on commissary restriction.
21. Core Civic Inc. is one of the largest distributors and consumer in trafficking narcotics and cell phones. Its brought in through check point, where administrators conduct searches.

22. Just 1 pack of cigarettes runs \$200.00 - \$500.00 depending on the brand.
23. The entire administration is involved in the trafficking. Those you think you can trust to give information to such as the wardens and Internal Affairs. Are the very ones that will have you killed.
24. The STG "Security Threat Group" Coordinator provide cell phones to special inmates to keep up with the affiliations.
25. Any attempts to stop, hinder or disrupt the flow of currency, will result in deaths such as the case of Aaron Blake Adams, Terry Childress and countless others whom lost their lives.
26. Food is used as punishment, at times officials will not feed the inmates.
27. Administration segregation building (A building) are denied complete access to outside recreation, personal and legal property. Only certain inmates can get food items from commissary. Only workers there in are allowed to have their T.V's and radios. Showers are rarely given, phone calls once a month and no access to cleaning supplies.
28. The Contract monitors are enforcing violence and this behavior and stand idly by and watches and approves of it.

I am writing this out of my own free will, knowing that my health, welfare, safety and security is in grave danger. But for the interest of justice for those we've lost to the system. If I shall die, you know who's responsible.

## PENALTY OF PERJURY

I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated this 23rd day of May 2022

## CERTIFICATE OF SERVICE

I certify I caused a true copy of this Declaration of Raymond E. Watson to be served on the following:

Lindsay E. Smith  
Daniel M. Horwitz  
Horwitz Law, PLLC  
4616 Westlawn Dr.  
Nashville, TN 37209

Dated this 23rd day of May 2022

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